

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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FOTINEE FARAH ZAKI, )  
Plaintiff, )  
v. ) C.A. No. 04CV10705RWZ  
UNITED STATES OF AMERICA, )  
Defendant. )  
\_\_\_\_\_  
)

**DEFENDANT'S MOTION FOR EXTENSION OF TIME IN WHICH TO FILE A  
RESPONSE TO PLAINTIFF'S MOTION FOR NEW TRIAL**

Now comes the defendant, United States of America, and hereby moves this Court for a fourteen-day extension of time **up to and including October 14, 2005**, to respond to the Motion for New Trial filed by plaintiff Fotinee Zaki on or about , 2005. As reasons therefore, the undersigned counsel for the United States asserts that recently she has had an unusual amount of litigation deadlines and this extension will allow counsel the necessary time to devote to completing this response.

The United States asserts that there have been no prior requests for extensions relative to the filing of this response.

WHEREFORE, the United States respectfully requests that this Court allows its motion for an extension of time **up to and including October 14, 2005**, to respond to Plaintiff's Motion for New Trial.

Respectfully submitted,

UNITED STATES OF AMERICA,  
By its attorney,

MICHAEL J. SULLIVAN  
United States Attorney

Dated: September 30, 2005

By: /s/ Gina Walcott-Torres  
Gina Walcott-Torres  
Assistant U.S. Attorney  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3369

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

The undersigned counsel certifies that she contacted counsel for the plaintiff in order to inform him of the relief sought herein.

/s/Gina Walcott-Torres  
Gina Walcott-Torres  
Assistant U.S. Attorney